



The Uniroyal Goodrich Tire Company
P.O. Box 1867
Ardmore, Oklahoma 73402
405/226-1200

August 15, 1989

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

RE: Uniroyal Goodrich Tire Company
EPA I.D. NO. ODK052880648

This is in response to your WARNING LETTER dated July 21, 1989. Attached you will find Revision No. 3 to the Company's Waste Analysis Plan and a typical copy of a manifest for transportation of Safety Kleen Corporation's Waste Compound (F002 F004).

The Waste Analysis plan has been Revised. Revision No. 3 adds an additional paragraph on page C-3 which says that The Uniroyal Goodrich Tire Co. will, by "knowledge of waste", consider ALL wastes which contain F-solvents to exceed the treatment standards, and will attach the proper notification to manifests as specified in 40 CFR 268.7 (a)(1).

The attached manifest, dated February 18, 1988, contains the required notification. All manifests for shipping the F-Solvents since February, 1988 have contained the required notice.

If you have any questions regarding this response, please contact the writer.

Sincerely,

DB Edwards

D.B. Edwards
(405) 221-2283

Engineering Dept.

de
Enclosures:

cc: Joan K. Lequitt, M.D.
Commissioner of Health
Oklahoma State Department of Health

6H

File Code

I.1.



UNIROYAL GOODRICH TIRE CO., INC.
ARDMORE, OKLAHOMA
RCRA I.D. NO. OKDO52880648

RESOURCE CONSERVATION AND RECOVERY ACT
PART "B" PERMIT APPLICATION

SECTION C
WASTE CHARACTERISTICS

REVISION NO. 3
AUGUST 15, 1989

CONTENTS	PAGE	REV NO.
WASTE CHARACTERISTICS	1	2
WASTE ANALYSIS PLAN	2-3	3
MATERIAL SAFETY DATA SHEETS		

Cement Ingredients:

	OLD CODE	NEW CODE
--	-------------	-------------

Isopropyl Alcohol	S0103	SV503	4-6	2
SO124 Solvent	S0124	SV797	7-8	2
SO145 Solvent	S0145	SV766	9-11	2
SO149 Solvent	S0149	SV749	12-14	2

Parts Cleaners:

Safety-Kleen Corp Part #6617	15-16	2
Safety-Kleen Corp Part #6631	17-18	2

LABORATORY TEST ANALYSES

Raw Material Work Order - Waste Rubber Cement	19	2
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WASTE ANALYSIS PLAN

This facility generates three hazardous waste streams: (1) Rubber cement waste (D001); (2) Spent parts immersion cleaning solvent (F002, F004); and (3) Spent parts cleaning solvent (D001).

RUBBER CEMENT:

Rubber cement used in the manufacture of tires is a mixture consisting of solvents (Type 1 gasoline, naptha, & toluene), alcohol, and rubber in various percentages, depending upon the particular cement specification. Fundamental knowledge indicates that any unused cement or contaminated cement will be ignitable. The material is handled throughout the manufacturing process as an ignitable material.

Information formulating the basis for hazard designation is contained in safety data sheets which are included in this section. Also included in this section are test results of a waste cement sample tested for flash point by our in-house lab.

PARTS CLEANING SOLVENT:

Two different parts cleaning solvents are used. Safety-Kleen Corp. Immersion cleaner No. 609 (Part # 6631) is used for the cleaning of curing press chucks in a 120 gallon vat located in the maintenance shop. Tyme carburetor cleaner (F001) was formerly used for the same purpose. Immersion cleaner No. 609 is a mixture of cresylic acids, petroleum sulfonate, methylene chloride, & ortho-di-chlorobenzene. Wastes generated from the use of the product is classified by waste codes F002 & F004 by Safety-Kleen Corp.

The second parts cleaning solvent used is Safety-Kleen Corp. 105 solvent-MS (Part # 6617). It is used by the maintenance department for the cleaning of parts. Twelve self contained cleaning stations are placed at various locations within the plant (see section D). 105 solvent-MS is 99.9 % mineral spirits. Wastes generated from the product is classified by waste code D001, ignitable.

Information formulating the basis for hazard designation is contained in safety data sheets for the two Safety-Kleen products. Safety-Kleen Corp. delivers solvent to the plant at regular intervals. On each visit, the representative removes used solvent from cleaning stations within the plant for recycling and replaces it with purified solvent from their recycling facility.

WASTE ANALYSIS:

Information provided on safety data sheets for the ingredients of rubber cement and Safety-kleen solvents is adequate to determine that wastes generated from the material will be

WASTE ANALYSIS PLAN (cont'd)

classified as hazardous. Because the wastes generated at this facility do not change significantly, additional testing is not considered necessary. Waste oils have been tested for hazardous characteristics and are not classified as hazardous waste. Waste oil is accumulated onsite in a 420,000 gallon standby fuel tank. It is analyzed for hazardous characteristics prior to reuse as a fuel onsite or sold to others for reuse as a fuel.

This facility will, by "knowledge of waste", consider ALL wastes which contain F-solvents to exceed the treatment standards, and will attach the proper notification to manifests as specified in 40 CFR 268.7 (a)(1).



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OKD052880648	Manifest Document No. 55666	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address UNIROVAL UNIROVAL RD ARDMORE OK 73402				A. State Manifest Document Number 068651		
4. Generator's Phone (405) 266-1200				B. State Generator's ID 99940		
5. Transporter 1 Company Name SAFETY-KLEEN CORP.		6. US EPA ID Number ILD051060408		C. State Transporter's ID 64041		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 817-855-6471		
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 1606 MISSILE ROAD WICHITA FALLS, TX 76306		10. US EPA ID Number TXD000747428		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID 64041		
				H. Facility's Phone 817-855-6471		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. WASTE COMPOUND CLEANING LIQUID, CORROSIVE MATERIAL, NA1760 (EPA TOXICITY, F002)		20	900	P	991002	
b.						
c. NOTICE: IN ACCORDANCE WITH 40 CFR 268.7, THE GENERATOR PROVIDES NOTICE THAT THE WASTE DESCRIBED AS 'WASTE COMPOUND CLEANING LIQUID' IS A RESTRICTED WASTE. THE WASTE CONTAINS THE FOLLOWING CONSTITUENTS WHOSE TREATMENT STANDARDS ARE NOTED: METHYLENE CHLORIDE(0.96PPM); 1,2-DICHLOROBENZENE(0.125PPM); AND CRESYLIC ACID(0.75PPM).						
d.						
J. Additional Descriptions for Materials Listed Above ITEM I(A) 991004; EPA, F002-F004		K. Handling Codes for Wastes Listed Above				
FOR RECYCLE						
15. Special Handling Instructions and Additional Information 6-049-04-2156 4PT 155666 TERR 0259 WK 8807						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name DILL SUTHERLAND		Signature <i>Dill Sutherland</i>		Date 2/18/88		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Mike Kair</i>		Date 2/18/88		
Printed/Typed Name Mike KAIR		Signature		Date		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name <i>James Wood</i>		Signature <i>James Wood</i>		Date 2/18/88		

Joan K. Leavitt, M.D.
Commissioner

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Lee W. Paden

**OKLAHOMA STATE
DEPARTMENT OF HEALTH**

P.O. BOX 53551
1000 NE TENTH
OKLAHOMA CITY, OK 73152



AN EQUAL OPPORTUNITY EMPLOYER

January 3, 1990

CERTIFIED MAIL



Mr. Steven R. Homolak
Uniroyal Goodrich Tire Company
600 South Main Street
Akron, Ohio 44318

Re: EPA ID No. OKD052880648, Ardmore, OK

Permit

Dear Mr. Homolak:

A routine review has been conducted of the financial assurance for Uniroyal Goodrich Tire Company to determine compliance with the Oklahoma Controlled Industrial Waste Disposal Act. That review revealed a violation of the Rules and Regulations for Industrial Waste Management (Rule or Rules). Rule 210 and 40 CFR 265.142(b) requires that every owner or operator of a controlled industrial waste facility provide demonstration of financial responsibility and submission of required information updated for inflation on a yearly basis. Even though your facility has been in the process of closing, updated financial information is a requirement until closure is certified.

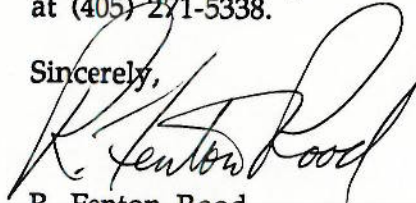
Your firm demonstrates financial responsibility by using a trust agreement. When this method is used, closure cost estimates adjusted for inflation must be submitted within 60 days prior to the anniversary of the establishment of the financial instrument. Schedule A of the trust agreement must be updated within 60 days after a change in the current closure cost estimate. The adjustment may be made by recalculating the maximum costs of closure in current dollars, or by using the most recent inflation factor. (Rule 210 and 40 CFR 265.142(b) and 265.143(a)(2).]

The above item of noncompliance is a significant violation. You must take all necessary actions to correct the above violation and submit appropriate documentation to this Department within thirty (30) days of receipt of this letter. By complying, you may avoid legal action, including an administrative order which may assess fines for failure to comply with the Oklahoma Controlled Industrial Waste Disposal Act and the Rules and Regulations for Industrial Waste Management.

Uniroyal Goodrich Tire Company
January 3, 1990
Page Two

If you have any questions or require further information, please contact Leah Peterson at (405) 271-5338.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Fenton Rood". The signature is fluid and cursive, with the first name "R." being small and the last name "Rood" being larger and more prominent.

R. Fenton Rood
Acting Programs Administrator
Industrial Waste Division

RFR/lp

cc: Ann Zimmerman
EPA Region VI

D. B. Edwards
Uniroyal Goodrich Tire Company
Ardmore, OK

Jimmy Givens
Staff Attorney

Joan K. Leavitt, M.D.
Commissioner

OKLAHOMA STATE
DEPARTMENT OF HEALTH

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Lee W. Paden

P.O. BOX 53551
1000 N.E. TENTH
OKLAHOMA CITY, OK 73152



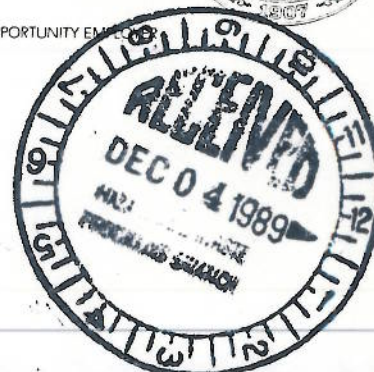
AN EQUAL OPPORTUNITY EMPLOYER

November 29, 1989

Certified Mail

D.B. Edwards
Engineering Department
Uniroyal Goodrich Tire Company
P.O. Box 1867
Ardmore, Oklahoma 73402

OKD 052880 648



Dear Mr. Edwards:

The Oklahoma State Department of Health (OSDH) has received correspondence from Fox & Dreschler, Inc., dated November 21, 1989, concerning the closure plans for Uniroyal's hazardous waste storage area. Fox & Dreschler stated that this was Uniroyal's response to the OSDH letter of October 10, 1989. OSDH indicated in that letter that further testing is required prior to finalizing decisions concerning closure. Your response implies that no further sampling is intended. OSDH has also mentioned to Uniroyal that we are not familiar with the "EPA soil limits" cited as acceptable soil contamination values and would expect documentation of where these values were derived (ie., specific guidance documents or Federal Register) so that we may obtain and review the EPA limits as applicable to this situation. Until these questions are addressed, no in-depth review of your submittal will be completed.

The Department reminds Uniroyal of its responsibility for providing closure of this unit in accordance with Rule 210 of the Rules and Regulations for Industrial Waste Management and 40 CFR 265 Subpart G. Additionally, in accordance with Rule 210 and 40 CFR 265.113(b), closure should have been completed by July 23, 1989 (180 days after plan approval). Although extension of this deadline has been reasonable due to the unexpected organic constituents found under the storage pad, OSDH is concerned with timely completion of this project. OSDH again directs Uniroyal to advise us of its schedule for collection of additional samples and that, further, all sampling data and requested information be submitted to us within forty-five (45) days. Failure to comply may subject Uniroyal to elevated enforcement action by this Department including issuance of an Administrative Order which may assess fines for violation of the Oklahoma Controlled Industrial Waste Disposal Act.

Sincerely,

R. Fenton Rood
Acting Programs Administrator
Industrial Waste Division

RFR\cv

cc: Andy Munson, Carter County Health Dept.
Terry Hill, District Sanitarian
Ann Zimmerman, EPA Region VI ✓
Fox & Dreschler, Inc.
Jimmy Givens, Staff Attorney

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

WARNING LETTER

ENF.

JUL 24 1989

Mr. Bill Sutherland, Hazardous Waste Manager
Uniroyal Goodrich Tire Company
P.O. Box 1867
Ardmore, Oklahoma 73402

Re: Uniroyal Goodrich Tire Company
EPA I.D. No. OKD052880648

Dear Mr. Sutherland:

This is a WARNING LETTER to notify you that your facility may be violating legal requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 et seq.

During the August 26, 1988, inspection of Uniroyal Goodrich Tire Company, Ardmore, Oklahoma, a violation pertaining to the RCRA land disposal was noted. The regulations which set out the prohibitions on management of restricted wastes are being promulgated in phases. These regulations can be found at 40 CFR Part 268 and revisions to Parts 260-265 and 270.

The State of Oklahoma is authorized by the Environmental Protection Agency (EPA) to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. §6926. However, the authorized State program does not include the provisions of Hazardous and Solid Waste Amendments (HSWA), Public Law No. 98-616, 98 Stat. 3221 (1984), and regulations promulgated thereunder. Therefore, EPA implements and enforces those regulations which are promulgated pursuant to HSWA, including the land disposal restrictions.

EPA believes that Section §264.13, which was revised to include provisions for Part 268, has been violated. Section §264.13 states, in part (emphasis added):

(b)(6) Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in §264.17, 265.314, 265.341, 268.7 of this chapter

6H-CS:MM:RA:dr:x6775:06-22-89		CONCURRENCES		File Code No. OKD052880648	
SYMBOL	6H-CS	6H-C	6H-C	6H-C	
SURNAME	TREGONING	BROWN	GERSH	HULLUM	
DATE					

The waste analysis plan must be revised to include the §268.7 testing and certification requirements. The amended plan must include:

- (a) (1) provisions for testing the waste, or an extract, developed using the test method described in Appendix I to Part 268 - Toxicity Characteristic Leaching Procedure (TCLP); and
- (2) provisions for testing and analysis which provide sufficient information to determine the following:
 - (i) Presence of F-solvent (F001-F005) wastes;
 - (ii) applicable treatment standards; and
 - (iii) qualification of waste for extension of the effective date;

or

- (b) a statement which says that the facility will, by "knowledge of waste", consider all accepted wastes which contain F-solvents to exceed the treatment standards, and will attach the proper notification to the manifest as specified in Section 268.7 (a)(1).

EPA believes that Section §268.7 has been violated. Section §268.7 states, in part:

- (a) The generator must test his waste, or an extract developed using the test method described in Appendix I of this part, or use knowledge of the waste to determine if the waste is restricted from land disposal under this part.
- (1) If a generator determines that he is managing a restricted waste under this part and the waste exceeds the applicable treatment standards, with each shipment of waste the generator must notify the treatment facility in writing of the appropriate treatment standard set forth in Subpart D of this part. The notice must include the following information:
 - (i) EPA hazardous waste number;
 - (ii) the corresponding treatment standard;
 - (iii) the manifest number associated with the shipment of waste; and
 - (iv) waste analysis data, where available.

Upon review of the inspection report for the inspection conducted at Uniroyal Goodrich Tire Company, on August 26, 1988, it appears that the facility's Waste Analysis Plan has not been revised to reflect the test methods required for managing all restricted wastes.

EPA requires adherence to the regulations found in 40 CFR §268. If you have not already done so, you must take immediate remedial action to implement the 40 CFR (§265 and 268) requirements. You must submit, within thirty (30) days of receipt of this letter, documentation and a description of the actions you have taken to correct the violations noted above, and you must implement the regulations of 40 CFR §265 and 268 within the same thirty (30) day period. Failure to comply with the requirements of this Warning Letter may subject you to liability for the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance in accordance with Section 3008 of RCRA, 42 U.S.C. §5928.

If you have any questions regarding this Warning Letter, please contact Mr. Mike Bira, U.S. Environmental Protection Agency, Region 6 (6H-CS) 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2793, (214) 555-5775.

Sincerely yours,

Allyn H. Davis
Director
Hazardous Waste Management Division (6H)

cc: Joan K. Leavitt, M.D.
Commissioner of Health
Oklahoma State Department of Health

bcc: L. Thompson (6H-CO)

FACT SHEET
Uniroyal Goodrich Tire Co.
Ardmore, OK

- ° On August 26, 1989, the Oklahoma State Department of Health (OSDH) performed a CEI at Uniroyal Goodrich .
- ° During the inspection several Class II violations were discovered.
- ° One of the Class II violations noted was failure to revise the Waste Analysis Plan (WAP) to include generation of an additional Land Disposal Restricted Waste (F004).

Recommendation

Issuance of a warning letter requesting documentation and description of corrective actions for violations.

Joan K. Leavitt, M.D.
Commissioner

Board of Health

Linda M. Johnson, M.D.
President
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Dan H. Fieker, D.O.
Burdge F. Green, M.D.
James L. Henry

Enf. Informal

**OKLAHOMA STATE
DEPARTMENT OF HEALTH**

P.O. BOX 53551
1000 N.E. TENTH
OKLAHOMA CITY, OK 73152



AN EQUAL OPPORTUNITY EMPLOYER

October 13, 1988

CERTIFIED MAIL

Bill Sutherland
Hazardous Waste Manager
Uniroyal Goodrich Tire Company
P.O. Box 1867
Ardmore, Oklahoma 73402

Re: Uniroyal Goodrich Tire Company (Uniroyal)
EPA ID No. OKD052880648

Dear Mr. Sutherland:

On August 26, 1988, the Oklahoma State Department of Health (Department) performed a compliance evaluation inspection of Uniroyal to determine compliance with the Oklahoma Controlled Industrial Waste Disposal Act (OCIWDA) and the Rules and Regulations for Industrial Waste Management (Rule or Rules). This notice of violation is a result of the following areas of noncompliance:

1. Permit Modification (40 CFR 270.41 and Rule 210)

Due to the change of the waste stream since the 1986 addition of F002 and F004 waste, Uniroyal is required to amend its operating permit to reflect the revisions needed in the areas of the waste analysis plan, personnel training plan and operating record, contingency plan and arrangements with local authorities. However, the wastes have been handled properly since the start of the change and the permittee has decided to terminate the storage permit.

2. Manifest Document Number (40 CFR 262.20 and Rule 210)

The manifest document numbers were consistently missing from all the manifests inspected. Please refer to Item 21 on page 453 of the 40 CFR (Part 262 Appendix) for a detailed explanation of this requirement. This requires very little effort other than paying more attention in filling out manifests.

3. Personnel Training Plan (40 CFR 264.16(a) and Rule 210)

Even though the personnel training plan in the permit was approved in 1983, the plan should be updated to include more detailed and specific instructions in the areas of:

- a. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment.
- b. Key parameters for automatic waste feed cut-off parameters.
- c. Use of communications or alarm system.



Mr. Bill Sutherland
Uniroyal Goodrich Tire Company
October 13, 1988
Page 2

- d. Response to fires or explosions.
 - e. Response to groundwater contamination incidents.
 - f. Procedures for shutdown of operations.
4. Personnel Training Records (40 CFR 264.16(b) through (e) and Rule 210)

Each hazardous waste management employee should be familiar with the handling and packaging of hazardous wastes as well as safety requirements for each waste. They should also receive annual refresher training from a qualified individual. Such training must be documented in the facility's operating record.

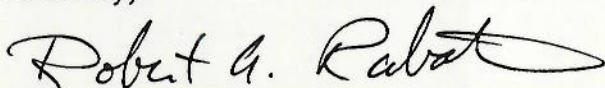
The above items of noncompliance are significant violations. You must take all necessary actions to correct the above violations and submit appropriate documentation to this Department within fifteen (15) days of receipt of this letter. By complying, you may avoid legal action.

Additionally, in our letter of August 5, 1988, the Department directed Uniroyal Goodrich Tire Company to submit its financial assurance for the fiscal year ending December 31, 1987. Uniroyal responded by letter, dated September 9, 1988, that it was unable to provide that documentation. This is a second reminder that Uniroyal must, through one or a combination of financial instruments, submit that documentation.

The authorized State program does not include the Land Disposal Restrictions, 40 CFR Part 268 (LDR) which became effective November 8, 1986. Therefore, the U.S. Environmental Protection Agency (EPA) implements and enforces the regulations pertaining to LDR. This letter does not preclude any future formal or informal enforcement action which EPA may determine to be appropriate regarding any possible LDR deficiencies.

If you have any questions or require further information, please contact Tiger Feng at (405) 271-7076.

Sincerely,



Robert A. Rabatine
Programs Administrator
Industrial Waste Division

RAR/TF/cgh

Enclosure

cc: Karen Bond, EPA Region VI
Carter County Health Dept.

Inspection Date 8/26.88
Disp. Plan No. 16001
Permit No. 3510012
EPA I.D. No. OKD052880648

OKLAHOMA CONTROLLED INDUSTRIAL WASTE COMPLIANCE INSPECTION

SITE IDENTIFICATION

A. Site Name Onizogal Goodrich Tire Co. B. Street (or other identifier) Onizogal Rd.
C. City Ardmore D. State OK E. Zip Code 73401 F. County Name Canter Co.
G. Site Operator Information

1. Name Bill Sutherland S. Telephone Number 405-226-1200
3. Street Onizogal Rd. 4. City Ardmore 5. State OK 6. Zip Code 73401

H. Site Description Tire Manufacturing facility

J. Type of Ownership
1. Federal ☐ 2. State ☐ 3. County ☐ 4. Municipal ☐ 5. Private ☒

K. 1. Generator ☐ 2. Transporter ☐ 3. Treatment ☐ 4. Storage ☒ 5. Disposal ☐

INSPECTION INFORMATION

A. Principal Inspector Information

1. Name Tiger Hecf 2. Title Facility Manager
3. Organization OSDH/IWD 4. Telephone No. (area code & No.) 271-7076

B. Inspection Participants

Bill Sutherland Onizogal Goodrich
Juan Corpen EPA
Tiger Hecf OSDH

F&L2

Doc
E1001

Permit expires on 10/1/88

*Transfer permitted
for waste oil*

**PERMITTED FACILITIES
TANKS**

(Rule 7.1.7, In Accordance With 264.190-264.199)

1. Does the owner/operator place wastes in the tank which are incompatible with the construction materials of the tank? ___ Yes ☒ No
 - a. If yes, is the tank protected from accelerated corrosion by:
 1. The use of an inner liner or coating which is compatible with the waste? ___ Yes ___ No
 - or
 2. The use of alternative means, such as cathodic protection or corrosion inhibitors? ___ Yes ___ No
2. Does the owner/operator maintain controls to prevent overfilling, such as waste feed cut-off or by-pass system to a stand-by tank? ☒ Yes ___ No
(Circle appropriate method.)
3. For uncovered tanks, is sufficient freeboard maintained to prevent overtopping by wave/wind action or by accumulated precipitation? *No* ___ Yes ___ No
If specified: freeboard required by permit:
freeboard on day of inspection:
4. Are ignitable or reactive wastes placed in the tank? ___ Yes ___ No
 - a. If yes,
 1. Is the waste treated, rendered or mixed before or immediately after placement in the tank so it is no longer ignitable or reactive? *W/* ___ Yes ___ No
 - or
 2. Is the waste protected from any material or conditions which may cause it to ignite or react? ___ Yes ___ No
 - or
 3. Is the tank used solely for emergencies? ___ Yes ___ No
 - b. Does the owner/operator comply with the buffer zone requirements (for storage of ignitable or reactive wastes in covered tanks) found in Tables 2-1 through 2-6 of the Flammable and Combustible Liquids Code? ☒ Yes ___ No
5. Are incompatible wastes placed in tanks? ___ Yes ☒ No
Note evidence of storage of incompatible wastes.

6. Provide a narrative description of the condition. *n/a*

- a. If problems exist with structural integrity, check facility records for most recent documentation of tank shell thickness. *none noted*

7. Are all above-ground tanks or groups of tanks enclosed by a dike, retention wall, etc. which meets the requirements of the permit? (Rule 7.2.4) *N/A*

____ Yes ____ No

- a. Are all contained liquids handled as controlled industrial waste? (Rule 7.2.2)

____ Yes ____ No

12/31. 86
Revision #3

FACILITY Criminal Growth

DATE 8/26.88

CLOSURE CHECKLIST
(Subpart G 265.110)

Area of
N/C

- _____ A. Does the facility have a closure plan? ✓ Yes _____ No _____ N/A
- _____ 1. Does the plan include:
- _____ a. A description of how and when the facility will be partially, then finally closed? ✓ Yes _____ No _____ N/A
- _____ b. An up-to-date estimate of the maximum inventory of wastes in storage and treatment at any time during the life of the facility? ✓ Yes _____ No _____ N/A
- _____ c. A description of the steps needed to remove or decontaminate all HW residues, contaminated containment system structures, equipment structures and spills. ✓ Yes _____ No _____ N/A
- _____ d. A schedule for closure of each Hazardous Waste management unit. ✓
- _____ e. An estimate of expected year of closure? 2020 ✓ Yes _____ No _____ N/A
- _____ 2. Does the plan include a schedule for final closure? If yes, does it include: ✓ Yes _____ No _____ N/A
- _____ a. Time estimates for each phase of closure for each area? ✓ Yes _____ No _____ N/A
- _____ b. Total time estimate for closure? ✓ Yes _____ No _____ N/A
- _____ 3. Using narrative explanations sheet, give a brief summary of how the facility plans to close each area of hazardous waste management; or attach a copy of the closure plan. ⊗ The existing & updated closure plan is in file, however, the permittee has indicated that it will not seek another permit after the exist. of one expires, therefore
- _____ 4. Does the plan address all areas of hazardous waste management? ✓ Yes _____ No _____ N/A separate diff. plan will be submit for review & approval
- _____ 5. Has the plan been amended as necessary to reflect changes in facility operations or design? ✓ Yes _____ No _____ N/A

FACILITY _____ DATE _____

Area of
N/C

6. Are cost estimates available and modified as necessary? ☒ Yes ☐ No ☐ N/A
If yes, give latest cost estimate and date of adjustments.
- B. Have closure activities begun at the facility? ☐ Yes ☒ No ☐ N/A

1. If yes:

- a. Was the closure plan submitted to the Director at least 180 days prior to beginning these activities? (45 days for a facility with only tanks, container storage or incinerator units.) ☒ Yes ☐ No ☐ N/A

- b. Were all wastes treated or disposed of within 90 days of the final receipt of wastes or 90 days after approval of the closure plan, if that is later? ☐ Yes ☒ No ☐ N/A

If no, give explanation including waivers or extensions granted by the Director.

☐ Yes ☒ No ☐ N/A

- c. Do the actual closure activities correspond to those written in the closure plan?

☐ Yes ☒ No ☐ N/A

If no, include narrative explanation.

2. Was closure completed within 180 days of receipt of final volume of wastes?

☐ Yes ☒ No ☐ N/A

If no, give explanation, including waivers or extensions granted by the Director.

3. At completion, did the facility submit a certification of closure to the Director?

☐ Yes ☒ No ☐ N/A

If yes, was it signed by both the owner/operator and an independent registered professional engineer?

☒ Yes ☐ No ☐ N/A

F&L2

GENERATOR: Original

DATE: 8/6/88

GENERATORS CHECKLIST

Note: On multiple part questions circle those not in compliance.

Section A EPA Identification Number.

Area of
N/C

1. Does Generator have EPA ID Number.
(262.12 - EPA ID Number) and approved Disposal
Plan (Rule 300)?

☒ Yes ___ No ___ N/A

a. If yes, EPA ID Number OKD052880648

b. OSDH Disposal Plan Number 10001

☒ Yes ___ No ___ N/A

Section B - Hazardous Waste Determination - (Rule 262.11)

1. Does generator generate hazardous waste(s) listed in
Subpart D (Rule 220 IAW 261.30 - 261.33 - List of
Hazardous Waste)?

☒ Yes ___ No ___ N/A

a. If yes, list wastes and quantities on attachment.
(Include Hazardous Waste Codes & provide waste
name and description.)

D001
H002
H004

2. Does generator generate solid waste(s) that exhibit
hazardous characteristics: (Corrosivity, ignitability,
reactivity, EP toxicity) (261.20 - 261.24
Characteristics of Hazardous Waste)?

☒ Yes ___ No ___ N/A

a. If yes, list wastes and quantities on attachment.
(Include Hazardous Waste Codes and provide
waste name and description)

b. Does generator determine characteristics by testing
or by applying knowledge of processes? Both

Mostly by knowledge

(1) If determined by testing, did generator use test
methods in Part 261, Subpart C (or equivalent)?

☒ Yes ___ No ___ N/A

(2) If equivalent test methods used, attach copy of
equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous
by generators? i.e. (process waste streams, collected
matter from air pollution control equipment, water
treatment sludge, etc.)

☒ Yes ___ No ___ N/A

Area of
N/C

FACILITY _____ DATE _____

- _____ a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process?

Both, more on the knowledge part

- _____ (1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☒ Yes ☐ No ☐ N/A

- _____ (2) If equivalent test methods are used, attach copy of equivalent methods used.

- _____ b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet).

— Waste oily sludge 21 yds³/mo.
— Waste oil 6000 gal/mo.

- _____ 4. Are any waste recycled, reused or reclaimed on site? ☒ Yes ☐ No ☐ N/A

If yes, use narrative to describe the type and quantity of the waste and the method used for reclamation.

Waste oil 100,000 gal One run during the months of 9 & 10 of 87

- _____ 5. Are any wastes shipped off-site for reclamation? ☒ Yes ☐ No ☐ N/A

If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment. Cyclic Acid to Safety Klean

- _____ 6. Is the total quantity of non acutely hazardous wastes generated:

- a. Less than 100 kg/month? ☐ Yes ☐ No ☒ N/A
b. More than 1000 kg/month? ☒ Yes ☐ No ☐ N/A
c. More than 100 but less than 1000 kg/month? ☐ Yes ☐ No ☒ N/A

If answer to 6.a. or 6.c. is yes, complete Small Quantity Generator Checklist and stop here.

Section C - Manifest

- _____ 1. Does generator ship hazardous waste off-site? (Subpart B - The Manifest 262.20)

☒ Yes ☐ No ☐ N/A

- a. If no, do not fill out Section C and D.

OSPCI, HRI &

- b. If yes, identify primary off-site facility(s).

Safety Klean

- _____ 2. Has generator shipped hazardous waste off-site since November 19, 1980?

☒ Yes ☐ No ☐ N/A

- _____ 3. Is generator exempted from regulation because of:

Small quantity generator (261.5 - Special requirements)
or

☐ Yes ☒ No ☐ N/A

Area of
N/C

FACILITY _____ DATE _____

produces non-hazardous waste at this time
(261.4 - Exclusions)?

___ Yes ☒ No ___ N/A

4. If not exempted does generator use a manifest?
(Act 1-2010)

☒ Yes ___ No ___ N/A

a. If yes, is manifest form approved by OSDH?
(Act 1-2010)

☒ Yes ___ No ___ N/A

(Check completed manifests at random. Indicate how many
manifests were inspected, how many violations were noted
and the type of violation).

5. Does all the following information appear on the
manifest(s)? (Rule 420 IAW 262.20)

☒ Yes ___ No ___ N/A

(Circle deficiencies)

- a. Manifest document number
- b. Generator's name
- c. Generator's EPA ID number
- d. Generator's State ID number (disposal plan number)
- e. Generator's address
- f. Generator's telephone number
- g. Generator's signature
- h. Date that waste was offered for shipment
- i. Transporter's name
- j. Transporter's EPA ID number
- k. Transporter's OK ID number
- l. Transporter's telephone number.
- m. Secondary transporter information (if applicable)
- n. Disposal facility name
- o. Disposal facility EPA ID number
- p. Disposal facility address
- q. Facility's telephone number
- r. Alternate facility information (if any)
- s. D.O.T. description of waste(s)
- t. Total quantity of each hazardous waste by units of weight
or volume, and the type and number of containers as loaded
onto vehicle.
- u. EPA waste code (if applicable)
- w. OK waste code
- x. Emergency Information (optional)
- y. Waste minimization certification
- z. Is the following certification on each manifest form: ☒ Yes ___ No ___ N/A

⊗ About 20 Manifests
were inspected.
They looked ok except
that the Manifest
document number
were missing from
all the manifests
inspected.

I hereby declare that the contents of this consignment are fully and
accurately described above by proper shipping name and are classified,
packed, marked, and labeled, and are in all respects in proper condition
for transport by highway according to applicable international and
national government regulations.

Area of
N/C

FACILITY _____ DATE _____

- ____ 7. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ___ No ___ N/A
- ____ 8. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ___ No ___ N/A
- ____ 9. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ___ No ___ N/A
- ____ 10. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? ___ Yes ___ No ☒ N/A

(a) If yes, did it contain the following information

1) Legible copy of manifest

___ Yes ___ No ☒ N/A

AND

2) Cover letter explaining generator efforts to locate waste.

___ Yes ___ No ☒ N/A

____ 11. Does (will) generator retain both copies of manifest for 3 years? (Rule 262.20)

☒ Yes ___ No ___ N/A

Section D Pre-Transport Requirements
(THESE REQUIREMENTS APPLY ONLY TO CONTAINERS THAT ARE BEING OFFERED FOR SHIPMENT OFF-SITE, THIS INCLUDES GONDOLAS)

____ 1. Does generator package waste?

☒ Yes ___ No ___ N/A

If no, skip the rest of Section D

If yes, complete the following questions

____ 2. Does generator package waste in accordance with 49 CFR 173, 178, and 179? (DOT requirements)(Rule 410 IAW 262.30 - Packaging)

☒ Yes ___ No ___ N/A

____ 3. Inspect containers to be shipped. (Rule 410) *Now Available*

a. Are containers to be shipped leaking or corroding or bulging?

___ Yes ___ No ☒ N/A

b. Use narrative explanations sheet to describe containers and condition.

c. Is there evidence of heat generation from incompatible wastes in the containers?

___ Yes ___ No ___ N/A

____ 4. Does the generator follow DOT labeling requirements before transport in accordance with 49 CFR 172? (Rule 262.31 labeling)

☒ Yes ___ No ___ N/A

Area of
N/C

FACILITY _____ DATE _____

5. Does the generator mark each package before transport in accordance with 49 CFR 172? (Rule 262.32 - Marking) ☒ Yes ☐ No ☐ N/A
Transportor sometimes do this job for the generator

6. Is each container of 110 gallons or less marked with the following label before transport? (Rule 262.32 - Marking) ☐ Yes ☐ No ☐ N/A

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency

None available for this inspection. the generator had just shipped some 30 drums one day before the inspection

Generator's Name and Address _____

Manifest Document Number _____

If other labels exist, list in narrative

No 7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (IAW 262.33)

8. Satellite Accumulation (effective June 20, 1985)

a. Does the generator accumulate waste in containers at or near "satellite" generation points? ☒ Yes ☐ No ☐ N/A

If no, skip to Section E

If yes, complete the following questions.

b. Are containers in good condition? ☒ Yes ☐ No ☐ N/A

c. Is the waste compatible with the containers? ☒ Yes ☐ No ☐ N/A

d. Is waste transferred from leaking containers or otherwise managed to control leakage? ☒ Yes ☐ No ☐ N/A

e. Are containers closed? ☒ Yes ☐ No ☐ N/A

f. Are containers marked with the words "hazardous waste" or identification of the contents? ☒ Yes ☐ No ☐ N/A

g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (262.34) or 55 gallons of other hazardous waste? ☐ Yes ☒ No ☐ N/A

If yes,

1. Has the container holding the excess amount been marked with the date the excess began accumulating? ☐ Yes ☐ No ☒ N/A

Area of
N/C

FACILITY _____ DATE _____

2. Have excess amounts remained in the satellite accumulation area longer than three (3) days?

Yes ☒ No ☐ N/A

SECTION E - Accumulation Time
(Rule 262.34 - Accumulation Time)

1. Is facility a permitted storage facility or does the facility have interim status for storage beyond 90 days?

Yes ☒ No ☐ N/A

2. If no:

- a. Is hazardous waste shipped off-site within 90 days

Yes ☐ No ☐ N/A

- b. Is waste stored in containers or tanks?

Yes ☐ No ☐ N/A

- c. Is the beginning date of accumulation time clearly marked on each container?

Yes ☐ No ☐ N/A

- d. Is each container or tank marked with the words "Hazardous Waste"?

Yes ☐ No ☐ N/A

- e. Complete and attach the container & tank checklists as appropriate.

- f. Does generator inspect containers for leakage or corrosion? (Rule 265.174-Inspections)

Yes ☐ No ☐ N/A

- g. (1) Does generator handle ignitable or reactive waste?

Yes ☐ No ☐ N/A

- (2) If yes, does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) inside facility's property line? (Rule 265.176 - Special Requirements for Ignitable or Reactive Wastes)

Yes ☐ No ☐ N/A

NOTE: If generator accumulates waste on-site for less than 90 days, fill out Generator Only Supplemental Checklist.

3. Describe storage area. Use photos and narrative explanation sheet.

The drum storage area is a 16' x 36' metal building located on a concrete apron within a curbed off area. The facility is permitted to store up to 70 drums. The concrete apron is sloped toward a pipe which drains to a 7000 gal. collection pit before entering the process sewer system.

Section F-Recordkeeping and Reports

1. Is generator keeping the following reports? (Rule 320 IAW 262.41 - Recordkeeping)(Note: the following must be kept for a minimum of three (3) years.)

- a. Manifests and signed copies from designated facilities?

Yes ☒ No ☐ N/A
Rev. 10-87

Area of
N/C

FACILITY _____ DATE _____

- _____ b. Quarterly Reports ☒ Yes ___ No ___ N/A
- _____ c. Exception Reports ___ Yes ___ No ☒ N/A
- _____ d. Test results where applicable ☒ Yes ___ No ___ N/A
- _____ e. Biennial Reports for each odd number year ☒ Yes ___ No ___ N/A
- _____ 2. Where are records kept (at facility or elsewhere)?

Office

- _____ 3. Who is in charge of keeping the records?

Name Bill Sutherland Title Hazardous Waste Manager

Section G. - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (Rule 262.50 - International Shipments)

___ Yes ☒ No ___ N/A

If yes,

- _____ a. Has he filed a notice with the Director
- _____ b. Is this waste manifested and signed by Foreign Consignee?
- _____ c. If generator transported wastes out of the country has he received confirmation of delivered shipment?
- _____ d. Has the generator filed an annual report (by March 1 of each year) give the type, quantity, frequency, and destination of all exported hazardous waste? (Per HSWA 1984)

___ Yes ___ No ☒ N/A

___ Yes ___ No ☒ N/A

___ Yes ___ No ☒ N/A

___ Yes ___ No ☒ N/A

F&L 2

Permitted RCRA Facility Checklist

EPA I.D. Number: OKD 052880648

Permit Number: 3510012
Issued: 10/24/1983
Expires: 10/24/1988

Required Notices

1. Has facility received wastes from a foreign source? Yes V No
- If yes, was the Director notified in writing at least four (4) weeks in advance? (Rule 7.1.7 in accordance with 40 CFR 264.12) Yes No
2. For off-site facilities, has the owner/operator informed all applicable generators in writing that the facility has the appropriate permits and will accept their waste? (Rule 7.1.7 in accordance with 40 CFR 264.12) N/A Yes No
- If yes, is a copy of this written notice retained in the operating record? Yes No

General Facility Requirements

1. Does owner/operator control all precipitation, run-on and run-off that is or may be contaminated with industrial waste (Rule 7.2.2).
- A. Explain: Yes, the drum storage area is roofed to prevent run-off contamination situation and is located on a concrete apron within a curbed area for run-on prevention.
- B. Is a containment structure used? V Yes No
1. Is the structure capable of retaining the total precipitation and run-off generated by a 24 hour, 100 year storm plus a minimum freeboard of two (2) feet? (Rule 7.2.2.2) N/A Yes No
2. Is all material handling conducted within the dikes, retention walls or other features, so that any leakage or spillage of industrial waste is adequately controlled? (Rule 7.2.3) V Yes No
2. a) Will the system contain the larger of:
- i. the volume of the largest truck and/or railcar to be loaded or unloaded; V Yes No
- or
- ii. a volume equivalent to 20% of the maximum total volume of all trucks and rail cars being loaded

or unloaded at one time;
plus the total precipitation and run-off generated
by the 24 hour/50 year storm;
plus a minimum freeboard of 12 inches

N/A

Yes No

3. Are all liquids contained in above structures handled as controlled industrial waste? (Rule 7.2.3.1)

Yes ☒ No

Explain: Some virgin materials (solvents) also contained.

Waste Analysis (Rule 7.1.7, In Accordance With 40 CFR 264.13)

1. Is a copy of the waste analysis plan maintained at the facility?

☒ Yes No

2. Is the waste analysis plan being implemented as specified in the permit?

There has been waste stream changes since 1986. Food Waste Yes ☒ No

3. Are copies of all analyses being retained in the operating record?

There should be a revised waste analysis plan to cover the revision. ☒ Yes No

Security

1. Is the facility exempted by permit from any security requirements?

Yes ☒ No

If yes, in a narrative explanation list specific permit requirements and specific measures actually implemented at the facility.

If no, answer question 2-3.

2. Does facility provide adequate security through:

- a. appropriate fence around the entire facility? (Rule 7.3.1)

☒ Yes No

- b. appropriate fence around the active portion of the facility?

☒ Yes No

- c. locked entrances? (Rule 7.3.1.3)

☒ Yes No

3. Are approved warning signs posted as required by the permit: (Rule 7.4.1)

- a. at entrances?

☒ Yes No

or

- b. Does the facility have adequate 24 hour surveillance system?

☒ Yes No

- c. Are warning signs posted at each corner of the facility? (Rule 7.4.1.2)

☒ Yes No

- d. Are warning signs posted at intervals of at least 400 foot along each side of the facility or as specified in the permit? (Rule 7.4.1.2)

☒ Yes No

- e. Are warning signs maintained so as to be readily visible? (Rule 7.4.2)

☒ Yes No

General Inspection Requirements (Rule 7.1.7, In Accordance With 40 CFR 264.15)

1. Does the owner/operator maintain a copy of the approved inspection schedule at the facility? ☒ Yes ☐ No
2. Does the owner/operator maintain an inspection log? ☒ Yes ☐ No
 - a. Does the log include the following:
 1. date and time of inspection ☒ Yes ☐ No
 2. name of the inspector ☒ Yes ☐ No
 3. notation of observations ☒ Yes ☐ No
 4. date/nature of repairs or other remedial action ☒ Yes ☐ No
 - b. Are inspections conducted according to the approved schedule? ☒ Yes ☐ No
 - c. Are there any problems noted in the inspection logs which have not been corrected? ☐ Yes ☒ No

If yes, explain in narrative.

3. Are inspection logs kept on file for at least three (3) years? ☒ Yes ☐ No

Personnel Training (Rule 7.1.7, In Accordance With 40 CFR 264.16)

1. Does the owner/operator maintain a copy of the approved training plan at the facility? ☒ Yes ☐ No
2. Does the training program instruct employees in the following?
 - a. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment. ☐ Yes ☒ No
 - b. Key parameters for automatic waste feed cut-off parameters. ☐ Yes ☒ No
 - c. Use of communications or alarm system. ☐ Yes ☒ No
 - d. Response to fires or explosions. ☐ Yes ☒ No
 - e. Response to groundwater contamination incidents. ☐ Yes ☒ No
 - f. Procedures for shutdown of operations. ☐ Yes ☒ No
3. Have all hazardous waste management personnel been trained according to the approved plan? ☒ Yes ☐ No
4. Is the program directed by a person trained in hazardous waste management procedures? ☒ Yes ☐ No
5. Has an annual training review been given to each employee? ☒ Yes ☐ No
6. Does the owner/operator maintain the following documents:

- a. job title for each position related to hazardous waste management and the name of the employee filling each job; ☐ Yes ☒ No
- b. written job description for each employee; ☐ Yes ☒ No
- c. written description of the type and amount of introductory and continuing training for each employee; ☐ Yes ☒ No
- d. documentation that employees have received all required training. ☐ Yes ☒ No
7. Are training records for current employees being maintained until closure? ☒ Yes ☐ No
8. Are training records for previous employees maintained for three (3) years from employee's date of separation? ☐ Yes ☒ No

General Requirements for Ignitable, Reactive or Incompatible Wastes (Rule 7.1.7, In Accordance With 40 CFR 264.17)

1. Does the facility manage ~~ignitable~~, reactive or incompatible wastes? ☒ Yes ☐ No
(Circle appropriate waste)

If yes:

- a. Is the waste separated and protected from sources or ignition or reaction? ☒ Yes ☐ No
 Explain in narrative. *The Waste Storage area is a controlled & confined area where is protected from Ignition Sources.*
- b. Are smoking and open flame confined to designated locations during handling of ignitable or reactive waste management? ☒ Yes ☐ No
- c. Are "no smoking" signs posted conspicuously in areas of ignitable or reactive waste management? ☒ Yes ☐ No
- d. Are these wastes handled in such a manner as to prevent generation of heat, pressure, fire, explosion, toxic mist, etc.? ☒ Yes ☐ No

Inspection of Facility (Rule 7.1.7, In Accordance With 40 CFR 264.31)

1. Is there any evidence of fire, explosion or release of hazardous waste threatening human health or the environment? ☐ Yes ☒ No
 Explain in narrative.

Required Equipment (264.32-34)

1. Is the facility exempted by permit from any equipment requirements? ☐ Yes ☒ No
 If yes, describe in narrative both permit requirements and actual facility equipment.

If no, answer questions 2 - 5.

2. Is the facility equipped with:

a. internal communication or alarm system capable of providing immediate emergency instruction; ☒ Yes ☐ No

b. telephone or two-way radio to call emergency response personnel ☒ Yes ☐ No

c. portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment. ☒ Yes ☐ No

3. Is emergency equipment tested and maintained as necessary to assure proper operation? ☒ Yes ☐ No

4. Do employees have direct access to alarms or communications devices whenever hazardous waste is handled? ☒ Yes ☐ No

5. Whenever only one employee is on the premises during facility operation does he have immediate access to a telephone (available at the scene) or two-way radio (hand held) to call emergency assistance? ☐ Yes ☐ No

Required Aisle Space (Rule 7.1.7, In Accordance With 40 CFR 264.35)

1. Does the owner/operator maintain proper aisle space at the facility? ☒ Yes ☐ No

Arrangements with Local Authorities (Rule 7.1.7, In Accordance With 40 CFR 264.37)

1. Does the owner/operator maintain a record of arrangements with local authorities? ☒ Yes ☐ No

2. Has the owner/operator notified local authorities of any changes in the hazardous waste management program which might affect their response to emergencies? ☐ Yes ☒ No
Waste stream has been changed since 1986

Contingency Plan and Emergency Procedures (Rule 7.1.7, In Accordance With 40 CFR 264.50-56)

1. Does the owner/operator maintain a copy of the approved contingency plan on-site? ☒ Yes ☐ No

2. Have copies of the plan been submitted to all local authorities? ☒ Yes ☐ No

3. Has the plan been amended as necessary to reflect changes in the facility and/or personnel? ☐ Yes ☒ No

4. Does the facility have a designated hazardous waste emergency coordinator?
If yes, give name and title: Bill Sutherland ☒ Yes ☐ No

5. Has an incident occurred which required implementation of the contingency plan? ☐ Yes ☒ No

a. If yes, did the emergency coordinator notify the Director in writing within 15 days?

N/A Yes ___ No ___

1. if yes, did this report include:

a. name, address, and telephone number of the owner/operator;

Yes ___ No ___

b. name, address and telephone number of the facility;

Yes ___ No ___

c. date, time and type of incident;

Yes ___ No ___

d. name and quantity of materials involved;

Yes ___ No ___

e. extent of injuries;

Yes ___ No ___

f. assessment of actual or potential hazards to human health or environment;

Yes ___ No ___

g. estimated quantity and disposition of recovered material resulting from the incident.

Yes ___ No ___

2. Provide narratives describing such incidents or attach a copy of the above report. (Include only those incidents occurring since the last inspection.)

Manifest System (Rule 4.3, 4.4.1, 7.1.7, In Accordance With 264.72)

Note: This section does not apply to owners/operators of facilities that do not receive hazardous waste from off-site sources.

1. If the facility receives waste accompanied by a manifest, does the owner/operator:

a. sign and date each copy of the manifest;

Yes ___ No ___

b. note any significant discrepancies (as defined in 264.72) in writing on each copy of the manifest;

Yes ___ No ___

c. immediately give the transporter at least one copy of the signed manifest;

Yes ___ No ___

d. within twenty (20) days, send a copy of the signed manifest to the generator;

Yes ___ No ___

e. retain a copy of each manifest at the facility for at least three (3) years.

Yes ___ No ___

2. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest?

Yes ___ No ___

3. Has the owner/operator discovered significant manifest discrepancies? (Rule 7.1.7, In Accordance With 40 CFR 265.72)

Yes ___ No ___

a. If yes;

1. Has the owner/operator attempted to reconcile the discrepancy with the generator or transporter? ☐ Yes ☐ No
2. If the discrepancy is not resolved within 15 days of waste receipt, has the owner/operator submitted a letter to the Director describing the discrepancy and attempts to reconcile it, along with a copy of the manifest? ☐ Yes ☐ No

Record Keeping and Reporting (Rule 7.1.7, In Accordance With 40 CFR 264.73-75)

1. Does the owner/operator maintain a written operating record? ☒ Yes ☐ No

a. If yes, does it contain:

1. A description and quantity of each waste handled and the methods and dates of its treatment, storage or disposal? ☒ Yes ☐ No
2. The location of each waste within the facility and the quantity at each location? ☒ Yes ☐ No

a. Is this information cross-referenced with specific manifest document numbers (if waste was accompanied by a manifest)? ☒ Yes ☐ No

b. For disposal facilities, is the information recorded on a map or diagram of each cell or disposal area? ☒ Yes ☐ No

3. Records and results of waste analyses? ☒ Yes ☐ No

4. Summary reports and details of all incidents that require implementation of the contingency plan? ☐ Yes ☒ No

5. Records and results of required inspections? ☒ Yes ☐ No

6. Monitoring, testing and analytical data? ☒ Yes ☐ No

7. For off-site facilities, notices to generators of the site's ability to dispose of particular wastes (as per 264.12b) ☒ Yes ☐ No

8. Closure and post-closure cost estimates, as applicable? ☒ Yes ☐ No

2. a. Has the owner/operator submitted monthly reports? ☐ Yes ☐ No

b. Has the owner/operator submitted annual reports that include cost estimates ☒ Yes ☐ No

3. Were all records furnished upon request and made available on the day of inspection? ☒ Yes ☐ No

4. Indicate types of hazardous waste facilities.

- ☒ Containers
- ☒ Tanks ← *for waste oil*
- ☐ Surface Impoundments
- ☐ Waste Piles
- ☐ Land Treatment
- ☐ Landfill
- ☐ Incinerator
- ☐ Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment

**PERMITTED FACILITIES
CONTAINERS**

(Rule 7.1.7, In Accordance With 264.170-264.178)

1. Are containers in good condition?
If no, explain in narrative. ☒ Yes ☐ No
2. Are containers or inner liners compatible with the hazardous waste?
In no, explain in narrative. ☒ Yes ☐ No
3. Are containers closed during storage? ☒ Yes ☐ No
4. Are containers opened, handled or stored in a manner which may rupture the container or cause it to leak?
If yes, explain in narrative. ☐ Yes ☒ No
5. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? ☒ Yes ☐ No
6. Is there evidence that incompatible wastes have been placed in the same container? ☐ Yes ☒ No
7. Are incompatible wastes in storage separated by distance or barriers (dike, berm, wall)? *N/A* Yes ☐ No
No incompatibles
8. Does the owner/operator maintain the proper number of containers in the storage area? ☒ Yes ☐ No
Permit limit 70
No. stored on day of inspection 2
9. Does the facility store hazardous waste containing free liquids? ☒ Yes ☐ No
 - a. If no, go to question 10.
 - b. If yes, answer questions 9.b.1 - 9.b.6
 1. Does the area have a base which is free of cracks, gaps and sufficiently impervious to contain leaks, spills and accumulated precipitation? ☒ Yes ☐ No
 2. Is the base sloped to drain accumulated liquids away from the containers? (Check for standing water, etc.) ☒ Yes ☐ No
or
Are containers protected from contact with accumulated liquids? ☒ Yes ☐ No
 3. Does the owner/operator maintain sufficient containment as specified in the permit? ☒ Yes ☐ No

Containment required:

Explain inadequacies in narrative.

4. Is run-on into the containment system prevented? ☒ Yes ☐ No
- a. If no, does the permit authorize additional containment system capacity? ☒ Yes ☐ No
5. Does the containment system capacity appear to be adequate? ☒ Yes ☐ No
6. Are accumulated liquids removed from the containment area so as to prevent overflow? ☒ Yes ☐ No
- a. Note any evidence of overflow.
- b. Describe in narrative how liquids are managed after being removed from the containment area.
10. For storage areas not containing free liquids:
- a. Is the area sloped to drain accumulated precipitation away from containers? ☒ Yes ☐ No
- or
- b. Are containers protected from contact with accumulated liquids? ☐ Yes ☐ No

Joan K. Leavitt, M.D.
Commissioner

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**OKLAHOMA STATE
DEPARTMENT OF HEALTH**

**P.O. BOX 53551
1000 N.E. TENTH
OKLAHOMA CITY, OK 73152**

AN EQUAL OPPORTUNITY EMPLOYER



August 5, 1988

CERTIFIED MAIL

Mr. David S. Devendorf
Vice President and Treasurer
The Uniroyal Goodrich Tire Company
600 South Main Street
Akron, OH 44318

Ref: The Uniroyal Goodrich Tire Company, Ardmore, OK
EPA ID No. OKD052880648

Dear Mr. Devendorf:

This letter is to inform you that the required updated financial information for FY 1987, due in this office by February 28, 1988 has not been received.

The Rules and Regulations for Industrial Waste Management require that every owner or operator of a controlled industrial waste facility provide demonstration of financial ability to properly close and care for the facility and to provide liability coverage for bodily injury and property damage resulting from the release of controlled industrial waste (Rule 210 and 40 CFR Part 265 Subpart H). A number of mechanisms to provide this demonstration are authorized by the regulations including the use of a financial test. Your firm chose to use the financial test last year.

Since the financial position of a firm is subject to fluctuations, the regulations require that all of the information submitted for the financial test be updated annually. 40 CFR 265.143(e)(5) requires that all three items originally submitted must be updated to reflect the financial status of the firm based on the latest completed fiscal year. This information must be submitted to the Oklahoma State Department of Health within ninety (90) days of the end of the company's fiscal year.

If a firm is unable to pass the financial test a combination of the following financial instruments may be used:

- trust agreement
- surety bond, including a trust agreement
- letter of credit, including a trust agreement
- financial test
- certificate of insurance
- corporate guarantee.

The above item of non-compliance is a serious violation. The Uniroyal Goodrich Tire Company must take all necessary actions to correct the above areas of non-compliance and submit appropriate documentation to this Department within thirty (30) days of receipt of

The Uniroyal Goodrich Tire Co.
August 5, 1988
Page 2

this letter. By complying, you may also avoid legal action, including an administrative order which may assess fines for failure to comply with the OCIWDA and the Rules and Regulations for Industrial Waste Management.

If you should have any questions, please contact me at (405) 271-7052 or have a member of your staff contact Leah Peterson at (405) 271-5338.

Sincerely,



Robert A. Rabatine
Program Administrator
Industrial Waste Division

cc: Mr. Steve Homolak
The Uniroyal Goodrich Tire Company
Akron, OH

Mr. Bill Sutherland
Ardmore, OK

Karen Bond
EPA Region VI